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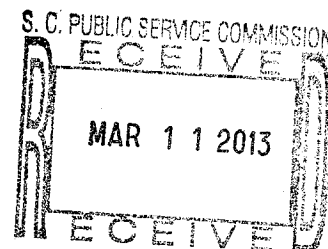
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March 6, 2013

Ms. Jocelyn G. Boyd
Chief Clerk & Administrator
Public Service Commission of SC
Post Office Drawer 11649
Columbia, SC 29211

Re: Office of Regulatory Staff vs. City of Laurens
2013-60-G

Dear Ms. Boyd:

Enclosed please find an original and one copy of an Answer of the City of Laurens Commission of Public Works. Please file the original and clock my copy and return the same to me in the self addressed stamped envelope that I have provided for your use.

Thanking you, I am

Cordially,


Donald B. Hocker

DBH/ras
enclosures

cc: Shannon Bowyer Hudson, Esquire
(w/enclosure)

cc: Vernon Gainey
(w/enclosure)

cc: Nanette Edwards
(w/enclosure)

cc: John Young
(w/enclosure)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2013-60-G

IN RE:

OFFICE OF REGULATORY STAFF)	
)	
Complainant/Petitioner)	
)	
vs.)	ANSWER
)	
CITY OF LAURENS)	
)	
Defendant/Respondent)	
_____)	

Note: The correct name of the Defendant/Respondent should be City of Laurens
Commission of Public Works

The named Defendant/Respondent would respectfully show unto this Honorable
Commission, in answer to the Petition, and allege:

1. That the named Defendant/Respondent will hereinafter refer to itself as Laurens
CPW.
2. That the Laurens CPW requests that the Petition filed by the
Complainant/Petitioner, hereinafter referred to as ORS, be dismissed in its entirety.
3. That the Laurens CPW denies each and every allegation of the Petition not
specifically admitted to herein.

4. That upon information and belief, Laurens CPW admits the allegations of Paragraph 1 of the Petition.

5. That the Laurens CPW denies the allegations of Paragraphs 2 and 4 of the Petition.

6. That as to the allegations of Paragraph 3 of the Petition, the Laurens CPW:

a. Admits as to subparagraph a. that it owns an eight inch gas pipeline but would show that the subject house and warehouse were build after the natural gas line was installed, that the natural gas line has always been clearly marked/flagged for existence and location purposes, and that right-of-ways are in existence. In addition it appears that the structures are over the natural gas line but it can not be determined for sure and therefore, no admission is made that in fact the structures are on top of the line.

b. Admits as to subparagraph b.

c. Denies as to subparagraph c.

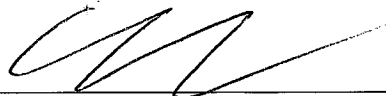
d. Admits as to subparagraph d. but would show that the Laurens CPW has never admitted any liability or responsibility in this matter but has only made efforts to cooperate with the requests of the ORS in order to resolve any problems or matters that may be in existence. The Laurens CPW has conducted periodic surveillance checks. In addition, the date of June 2013 was only an estimation/approximation.

e. Neither admit or deny as the Regulation speaks for itself.

f. Admits as to subparagraphs f and g. and would further show that there are no regulations or laws in existence that prevents a structure being located over a natural gas line.

7. That the Laurens CPW has always complied with all statutory and regulatory requirements and provisions in the exercise of reasonable care as it relates to its natural gas system and will continue to do so with respect to this situation and any other situations related to its system.

WHEREFORE, the Laurens CPW requests that this matter be resolved in its favor and/or the Petition dismissed.



DONALD B. HOCKER, Bar No. 2535
Attorney for City of Laurens Commission of
Public Works
P.O. Box 972
Laurens, South Carolina 29360
864-984-4574

Laurens, South Carolina
Date: 3-4-13

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CERTIFICATE OF SERVICE

I certify that on this date of copy of the foregoing was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable rule of civil procedure.

This 6th day of March, 2013
Rogin A. Snow